REMARKS

Favorable reconsideration of this application as presently amended and in light of the following discussion is respectfully requested.

Claims 1-5, 7, and 9-15 are pending in the present application. Claims 11-15 are added by the present amendment.

The Advisory Action maintains the rejections of Claims 1-7, 9, and 10. In the Office Action of August 24, 2006, Claims 1 and 9 were rejected under 35 U.S.C. § 103(a) as unpatentable over Helgeson et al. (U.S. Patent No. 6,643,652, herein "Helgeson") in view of Gershman et al. (U.S. Patent No. 6,199,099, herein "Gershman"); and Claims 2-5, 7, and 10 were rejected under 35 U.S.C. § 103(a) as unpatentable over Helgeson, Gershman, and Conner et al. (U.S. Patent No. 6,718,515, herein "Conner").

The outstanding rejections on the merits are respectfully traversed for the following reasons.

Briefly recapitulating, independent Claim 1 is directed to a portal application that includes instructions for a portal core service, a user management core service, and a plurality of special services. Each special service is structured according to a model-view-controller architecture and each special service includes at least one model containing data, a controller for the special service, and at least one view for the presentation of the data of a model. Each of the plurality of special services are designed to communicate with each of a remaining plurality of special services directly, via the controller of the special service. Independent Claims 7 and 9 recite the above noted features of Claim 1.

Regarding the last claimed feature, Applicants presented arguments in the last filed amendment that this feature is neither taught nor disclosed by the applied art because Helgeson specifically discloses that an application may depend from a core service but not from another application.

In reply to this argument, the outstanding Office Action asserts in the Response to Arguments section that the teachings of <u>Helgeson</u> are not limited as discussed above, i.e., an application (asserted to correspond to the claimed special service) may depend only on one core service and not on another application.

The outstanding Office Action considers that the claimed feature of each special service communicating directly with each of a remaining special service via the controller of the special service, which is asserted as being suggested by <u>Helgeson</u> at column 6, line 19 by the language "all dependencies be directed downwards," is only one of many scenarios disclosed in <u>Helgeson</u> and is only an alternative presented by <u>Helgeson</u>.

Further, the outstanding Office Action refers on page 7 to two specific disclosures of <u>Helgeson</u> that allegedly disclose the claimed invention. More specifically, the outstanding Office Action indicates that the disclosure of <u>Helgeson</u> at column 11, lines 28-45 describes a tier application server 307 that illustrates a business application platform, which is also referred to as the "platform" or the "SABA architecture" at column 4, line 55 in <u>Helgeson</u>.

However, the tier application server 307 is described in accordance with the so-called "preferred embodiment" at column 11, line 27 in <u>Helgeson</u>. In this preferred embodiment of <u>Helgeson</u>, the "platform" or the "SABA architecture" are described as requiring that all dependencies be directed downwards (see column 5, line 55 for the "preferred embodiment" and column 6, line 16 for the "downward dependencies").

Based on this disclosure of <u>Helgeson</u>, one of ordinary skill in the art would understand that the applications of the platform may depend on one or more sets of core services but not on other applications. As these two teachings refer to the same preferred embodiment of <u>Helgeson</u>, Applicants respectfully submit that one of ordinary skill in the art would not consider the application server 307 of <u>Helgeson</u> as allowing any communication between applications, contrary to the assertion of the outstanding Office Action.

The second reference to Helgeson noted by the outstanding Office Action about the claimed special service communication is at column 49, line 55 to column 50, line 10, at column 50, line 53 to column 51, line 40, and at column 51, line 54 to column 52, line 38. In these disclosures of Helgeson, an application for creating an HTML data is described.

However, this application in Helgeson appears to be built according to a model-view-controller architecture. A model, which contains all the data and interactivity for a given page, is first loaded and processed. Then, a controller uses an adequate view to produce the HTML page based on the processed data of the model.

Thus, Applicants respectfully submit that Helgeson does not teach or suggest any communication between applications or special services as required by Claims 1, 7, and 9. On the contrary, the creation of the HTML pages in Helgeson appears to be carried out by *one* application that transforms data of a model according to a given view.

Gershman and Conner have been considered but do not cure the deficiencies of Helgeson discussed above.

Accordingly, it is respectfully submitted that independent Claims 1, 7, and 9 and each of the claims depending therefrom patentably distinguish over Helgeson, Gershman and Conner, either alone or in combination.

New Claims 11-15 have been added to set forth the invention in a varying scope and Applicants submit the new claims are supported by the originally filed specification. More specifically, new independent Claim 11 recites characteristics of the portal core service, the user management core service, the relationships between the portal core service, the user management core service, and the plurality of special services, and how a request from a client is forwarded from the portal core service and the user management core service to a first special service and then to a second special service. New Claim 11 finds support in Figure 1, in which the core services 5-7 and the special services 8-10 are shown and also in

Figure 5, in which a request from a client 11 is shown coming to the portal core service 5 and then forwarded to a special mail service 8. New dependent Claims 12-15 correspond to original Claims 2-5.

In addition, the specification discloses at page 7, Framework Services that are offered from the portal framework and Special Services that are offered "through the portal," and on page 8, lines 29-32, how a request from a user is forwarded to a specific service which itself can forward the request to another, more specific, service. No new matter has been added.

Independent Claim 11 is directed to a portal application that provides access for a client to a multimedia service provider via a portal. The portal application has a portal core service configured to perform administrative services, a user management core service configured to perform client related services, and a plurality of specials services. The portal core service and the user management core service are located at the portal and the plurality of special services are located at the multimedia service provider. The portal core service and the user management core service forward a request from the client to a first of the special services and the first special service is configured to forward the request from the client to a second special service when the second special service has more specific information than the first special service.

In a non-limiting example, Figure 1 shows the client 11, the portal core service and the user management core service 5-7, and the plurality of special services 8-9. In another non-limiting example, Figure 5 shows the portal core service 5 and the user management core service 6 located at the portal (dotted line) and the special services 8 and 9 located at the multimedia service provider (outside the dotted line). Furthermore, Figure 4 shows the controller C of a first special service configured to forward a request from the browser 11 to another controller C of a second special service.

Turning to the applied art, <u>Helgeson</u> shows in Figures 1 and 3 a plurality of clients 101, 103, 116, 117, and 118 connected to servers 1-3. However, <u>Helgeson</u> does not teach or suggest, (i) that part of the services are provided at a portal and the other services are provided at the multimedia service provider, (ii) the services provided at the portal forward a request from a client to a first of the special services, and (iii) the first special service forwards the request from the client to a second special service when the second special service has more specific information than the first special service, as required by new Claim 11.
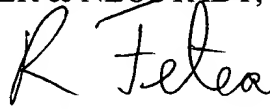
In addition, as recognized by the outstanding Office Action at page 8, second last paragraph, <u>Helgeson</u> "do not specifically mention about communicating with each of a remaining a plurality of services directly...., via controller." However, <u>Gershman</u> also does not teach or suggest features (i)-(iii) discussed above in regard with <u>Helgeson</u>.

Accordingly, it is respectfully submitted that independent Claim 11 and each of the claims depending therefrom patentably distinguish over <u>Helgeson</u> and <u>Gershman</u>, either alone or in combination.

Consequently, in light of the above discussion and in view of the present amendment,

the present application is believed to be in condition for allowance and an early and favorable

action to that effect is respectfully requested.

Respectfully submitted,

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